

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

YOUNG AMERICA'S FOUNDATION;
BINGHAMTON UNIVERSITY
COLLEGE REPUBLICANS; and JON
LIZAK, President of the College
Republicans of Binghamton University,

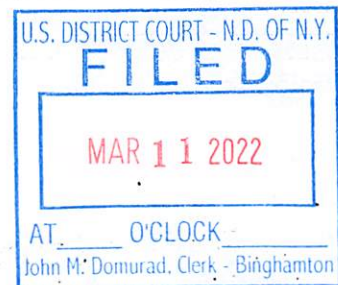
ANSWER

Plaintiff(s),

-against-

HARVEY STENGER, President of
SUNY-Binghamton, in his official and
individual capacities; BRIAN ROSE, Vice
President for Student Affairs of SUNY Binghamton,
in his official and individual capacities; JOHN
PELLETIER, Chief of SUNY Binghamton UPD,
in his official and individual capacities; COLLEGE
PROGRESSIVES, a student organization
at SUNY-Binghamton; PROGRESSIVE
LEADERS OF TOMORROW ("PLOT");
STUDENT ASSOCIATION OF
BINGHAMTON UNIVERSITY,

Civil Action No. No. **3:20-cv-822**



Defendant(s).

State of New York)
) ss:
County of Broome)

Masai Andrews, being duly sworn, deposes and says:


1. I am a resident of the State of New York.
2. On February 09, 2021, I received service of a summons in a civil action as a non-party.
3. I am *pro se*.
4. Answering the Plaintiff's Complaint, I do not have sufficient knowledge or information upon which to base a belief as to the truth of the allegation contained therein, as I am not a

Principal, "officer, a managing or general agent, or any other agent" of any entities named in said Complaint, nor do I have any affiliation thereof, and therefore deny each and every allegation contained therein.

WHEREFORE, this Answering party prays that this Honorable Court will:

1. Dismiss the Complaint with prejudice or grant Plaintiff a reduced amount based upon the admissions, denials and affirmative defenses, if any, as alleged above herein;
2. Award costs to any and all legitimate Defendants; and
3. Award such other and further relief as the Court deems just and Equitable to any and all legitimate Defendants.

Dated: February 10, 2021
Binghamton, New York



Masai Andrews

VERIFICATION

I, Masai Andrews, have read the foregoing Motion, and know the contents thereof. The same are true to my knowledge, with the exception of matters therein stated to be alleged on information and belief and as to those matters, I believe them to be true. To the best of knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions herein are not frivolous.



Masai Andrews
Endicott, NY
Phone: 518.334.1883

STATE OF NEW YORK COUNTY OF BROOME

On the 8th day of March in the year 2021, before me the undersigned, a notary public for said state, personally appeared, personally known to me, or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to within the instrument and acknowledged to me that s/he executed the same in his/her signature on the instrument, the individual, or the person on the behalf of which the individual acted, executed the instrument.

Sworn to before me this
8th day of March 2022

Pamela Van Blargan
Notary Public

